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10 Lead Counsel for Plaintiffs

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 In re VERIFONE HOLDINGS, INC.) Master File No. 3:07-cv-06140-MHP
SECURITIES LITIGATION)
14 _____) CLASS ACTION
15 This Document Relates To:)
16 ALL ACTIONS.) STIPULATION AND [PROPOSED] ORDER
) ALLOWING CONSOLIDATED BRIEFING
) IN OPPOSITION TO DEFENDANTS'
) MOTIONS TO DISMISS
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1 Pursuant to Civil L.R. 7-12, the parties hereby stipulate as follows:

2 1. On January 14, 2010, this Court entered the parties' Stipulation and Order Regarding
3 Amendment of Complaint and Modification of Briefing Schedule for Defendants' Motions to
4 Dismiss;

5 2. On January 19, 2010, plaintiff filed the Second Amended Consolidated Complaint for
6 Violations of the Federal Securities Laws;

7 3. On March 5, 2010, defendants filed three separate motions to dismiss, as follows:
8 (1) defendants VeriFone Holdings, Inc., Douglas Bergeron, William Atkinson and Craig Bondy filed
9 one 25-page motion to dismiss; (2) defendant Barry Zwarenstein filed one 11-page motion to
10 dismiss; and (3) defendant Paul Periolat ("Periolat") filed one 21-page motion to dismiss;

11 4. Defendants' respective motions to dismiss joined in and incorporated all other
12 motions by reference;

13 5. The deadline for plaintiff's opposition brief(s) is April 19, 2010;

14 6. Pursuant to Civil L.R. 7-3(a) and (c), plaintiff ~~is permitted to file three separate 25-~~ shall ~~one 35-page~~
15 ~~page~~ briefs~~s~~ in opposition to ~~the~~ defendants' motions to dismiss; and

16 7. Plaintiff has opted to oppose defendant Periolat's motion in a separate 25-page
17 opposition brief;

18 8. Plaintiff and the non-Periolat defendants believe it would be more efficient and cost
19 effective to allow plaintiff to consolidate briefing for the non-Periolat defendants into one combined
20 brief.

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1 9. Although the non-Periolat defendants believe that such a combined brief should not
2 exceed 40 pages, as the parties previously stipulated in connection with plaintiff's prior opposition to
3 the motions to dismiss the previous Consolidated Complaint (Docket Entries 173-174), the non-
4 Periolat defendants have agreed to plaintiff's request for a combined opposition brief not to exceed
5 **35**
~~45~~ pages in order to avoid a potential administrative motion on the issue.

IT IS SO STIPULATED.

DATED: March 30, 2010

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/s/

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DATED: March 30, 2010

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Attorneys for Defendants VeriFone Holdings, Inc., Douglas Bergeron, William Atkinson and Craig Bondy

1 DATED: March 30, 2010
2

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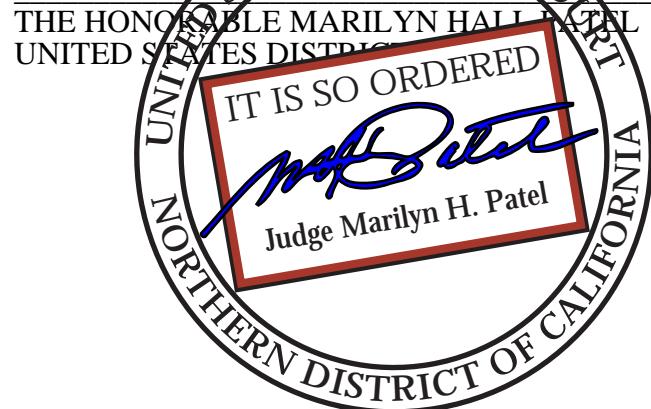
12 I, Eli R. Greenstein, am the ECF User whose ID and password are being used to file this
13 STIPULATION AND [PROPOSED] ORDER ALLOWING CONSOLIDATED BRIEFING IN
14 OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS. In compliance with General Order
15 45, X.B., I hereby attest that Scott C. Hall and Brian L. Levine have concurred in this filing.

16 _____/s/
17 ELI R. GREENSTEIN
18 * * *

19 **O R D E R**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED. AS MODIFIED

21 DATED: 3/31/2010



CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 30, 2010.

/s/
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